UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

JORDAN RINDGEN,

Plaintiff,

NOTICE OF MOTION

-against-

3:24-CV-1325 (AJB-ML)

BROOME COUNTY, BROOME COUNTY
DISTRICT ATTORNEY'S OFFICE, MICHAEL A.
KORCHAK, former Broome County District
Attorney, MARK LOUGHRAN, former Chief
Assistant District Attorney, ALYSSA CONGDON,
Assistant District Attorney, AMANDA CRONIN,
Assistant District Attorney, JEFF J. WAGNER, District
Attorney Investigator, UNIDENTIFIED JANE/JOHN
DOE #1-10, Broome County Employees, CITY OF
BINGHAMTON, POLICE CHIEF JOSEPH T.
ZIKUSKI, CAPTAIN CORY MINOR, DETECTIVE
AMANDA MILLER, UNIDENTIFIED JANE/JOHN
DOE #1-10, City of Binghamton Employees, HAILEY
DEMKOVICH, SAMANTHA HERCEG,

PLEASE TAKE NOTICE that upon the enclosed Memorandum of Law, the undersigned, on behalf of Defendant Amanda Cronin (hereinafter "Ms. Cronin"), shall move this Court upon submission of the papers before the Honorable Anthony J. Brindisi, United States District Court Judge for an order pursuant to Federal Rule of Civil Procedure 12(c) for judgment on the pleadings in Ms. Cronin's favor and for such other and further relief as the Court deems appropriate.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 7.1(a)(1) of the Local Rules of Practice of the United States District Court for the Northern District of New York, any papers to be submitted in opposition to this motion must be filed with the Clerk of the Court and served

upon counsel for Ms. Cronin no more than twenty-one (21) days after service of this motion, or on such other date as ordered by the Court.

DATED: February 24, 2025

CAPEZZA HILL, LLP

Benjanin W. Hill, Esq.

Alexandra N. von Stackelberg, Esq. Attorneys for Amanda Cronin

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